

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALEJANDRO MANUEL ZAPATA OSORIO,
ARTURO DEL RAZO, BRAULIO
ROLANDO CASHABAMBA CHANGO,
BYRON SALVADOR BARRERA SANCHEZ,
CARLOS E. SIERRA RODRIGUEZ, EDWIN
FABRICIO CASHABAMBA TUBON, JESUS
SIERRA, JUAN SIERRA, RAMON ROSALES
GALVEZ, RAUL CHAVEZ DIAZ, SEGUNDO
LEANDRO ALULEMA GUANO, SEGUNDO
NICOLAS SIGUENCIA ENCALADA, and
WILDER RODRIGUEZ, *individually and on behalf
of others similarly situated,*

Plaintiffs,

- vs -

VECTOR STRUCTURAL PRESERVATION CORP.
(D/B/A VECTOR STRUCTURAL PRESERVATION),
NORTH STAR STRATEGY, INC.
(D/B/A NORTH STAR STRATEGY, INC.), BILL
HANDAKAS, BILL HANDAKAS, VASSILIOS
HANDAKAS , and SERGIO DOE,

Defendants.
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Declaration of Michael M.
Rabinowitz in Support of
Defendants' Pre-Motion Letter and
Motion for Summary Judgment

Case No. 1:19-cv-04896-LDH-ST

Michael M. Rabinowitz, an attorney duly admitted to practice law before this Court,
declares the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a partner with the law firm of Rabinowitz, Galina & Rosen, attorneys for
Defendants Vector Structural Preservation Corp. (d/b/a Vector Structural Preservation)
(hereinafter referred to as "Vector"), Bill Handakas, and Vassilios Handakas (collectively,
"Defendants") in the above captioned action, and I am fully familiar with the facts stated herein.

2. I make this Declaration in support of Defendants' Pre-Motion Letter and anticipated
Motion for Summary Judgment.

3. Annexed hereto as Exhibit "A" is a true and accurate copy of the Deposition Transcript of Vassilios Handakas in this matter.

4. Annexed hereto as Exhibit "B" is a true and accurate copy of the Deposition Transcript of Wilder Rodriguez in this matter.

5. Annexed hereto as Exhibit "C" is a true and accurate copy of the Deposition Transcript of Carlos E. Sierra in this matter.

6. Annexed hereto as Exhibit "D" is a true and accurate copy of the Deposition Transcript of Omar Delraza in this matter.

7. Annexed hereto as Exhibit "E" is a true and accurate copy, with redactions of non-parties, of Vector Structural Preservation Corp.'s Payroll Register for March 1, 2018 through August 31, 2018.

8. Annexed hereto as Exhibit "F" is a true and accurate copy of Payroll Records, with redactions of non-parties, for North Star Strategy Inc. and South Side Services for various weeks in 2018 and 2019.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 26, 2022.



Michael M. Rabinowitz